

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. NAGEL
CLERK OF COURT

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UNITED STATES OF AMERICA

Case No.

Plaintiff,

vs.

SAGARKUMAR SURESH PATEL

Defendant.

18 U.S.C. §2(a)
18 U.S.C. §1341
18 U.S.C. §1349

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

Conspiracy to Commit Mail Fraud
[18 U.S.C. §1349]

1) Beginning on or about March 1, 2021 and continuing through on or about June 4, 2021, in the Southern District of Ohio and elsewhere, **DEFENDANT SAGARKUMAR SURESH PATEL (DEFENDANT PATEL)**, did knowingly and willfully conspire and agree with others, both known and unknown to the Grand Jury, to violate 18 U.S.C. §1341, that is to devise or knowingly participate in a scheme or artifice to defraud, or obtain money by materially false or fraudulent pretenses, representations or promises; and did for the purpose of executing or attempting to execute the scheme or artifice, knowingly take or receive money or property from an authorized depository for mail, or knowingly caused money or property to be delivered by United States Postal Service or private or commercial carrier.

PUPROSE OF THE CONSPIRACY

2) It was the purpose of the conspiracy for **DEFENDANT PATEL** and co-conspirators to perpetuate a mail fraud scheme and unlawfully enrich themselves by convincing victims through deception and threats to send large amounts of cash through public or private carriers to mail depositories in the Southern District of Ohio and elsewhere.

MANNER AND MEANS

3) It was part of the scheme that the **DEFENDANT PATEL** or co-conspirators would contact victims by telephone and misrepresent to the victims that they were law enforcement officers or attorneys working for the Federal government.

4) It was further part of the scheme that **DEFENDANT PATEL** or co-conspirator would falsely inform the victims that active arrest warrants had been issued for them for various criminal violations, and/or that their social security numbers and bank accounts had been compromised and were no longer secure.

5) It was part of the scheme that **DEFENDANT PATEL** or co-conspirator would falsely inform the victims that to avoid losing their money, they needed to withdraw large sums of cash from their bank accounts and send it to Defendant Patel or co-conspirator.

6) It was part of the scheme that the **DEFENDANT PATEL** or co-conspirator would further instruct the victim to divide the money amongst several reading magazines and place the currency throughout the pages of the magazines.

7) It was part of the scheme that **DEFENDANT PATEL** or co-conspirator would further instruct the victims to place each magazine in a bubble-wrapped envelope and then wrap all the magazines in bubble wrap before securing them in a cardboard box with brown packing tape.

8) It was further part of the scheme that **DEFENDANT PATEL** or co-conspirator would tell the victims to send the package through FedEx or other mail carrier to “Keith George” or other alias used by Defendant Patel or co-conspirator.

9) It was further part of the scheme that **DEFENDANT PATEL** or co-defendant would instruct the victims to send the package to a Walgreens or other mail depository.

10) It was further part the scheme that **DEFENDANT PATEL** or co-conspirator would pick-up the packages from Walgreens or other depository using fraudulent identification.

All in violation of 18 U.S.C. §1349.

COUNTS 2-4
Mail Fraud
[18 U.S.C. §1341 & §2(a)]

11) Paragraphs 3 through 10 are realleged and incorporated by reference as though fully set forth herein.

12) On or about each of the dates set forth below, as part of continuing course of conduct, in the Southern District of Ohio and elsewhere, **DEFENDANT PATEL**, with intent to defraud, devised or knowingly participated in a scheme or artifice to defraud, or obtain money by materially false or fraudulent pretenses, representations or promises, and did for the purpose of executing or attempting to execute the scheme or artifice, knowingly take or receive money or property from an authorized depository for mail, or knowingly caused money or property to be delivered by United States Postal Service or private or commercial carrier, as follows:

Count	Approx. Date of Delivery	Victim	Carrier	Depository	Approx.Cash Amount
2	June 3, 2021	GHR	FedEx	Walgreens-OH	\$25,000
3	June 2, 2021	KNH	FedEx	Walgreens-OH	\$32,000
4	June 3, 2021	SHF	FedEx	Walgreens-OH	\$22,000

All in violation of 18 U.S.C. §1341 and §2(a).

A TRUE BILL.

/Foreperson
FOREPERSON

VIPAL J. PATEL
ACTING UNITED STATES ATTORNEY

/Kenneth F. Affeldt
KENNETH F. AFFELDT (0052128)
Assistant United States Attorney